

EXHIBIT I

1
2
3
4
5
6
7 UNITED STATES BANKRUPTCY COURT
8 WESTERN DISTRICT OF WASHINGTON - TACOMA
9
10

9 SARAH HOOVER,
10

11 Debtor,

12 BK No. 19-42890- MJH
13

14 Adv No. 20-04002 – MJH
15

16 Chapter 7
17

18 SARAH HOOVER,
19

20 Plaintiff,
21

22 SECOND SET OF INTERROGATORIES
23 AND REQUESTS FOR PRODUCTION
24 TO DEFENDANT NEWREZ, LLC
25

26 v.
27
28 QUALITY LOAN SERVICE
29 CORPORATION OF WASHINGTON,
30 PHH MORTGAGE CORPORATION DBA
31 PHH MORTGAGE SERVICES, HSBC
32 BANK USA, N.A. AS TRUSTEE OF THE
33 FIELDSTONE MORTGAGE
34 INVESTMENT TRUST, SERIES 2006-2,
35 NEWREZ, LLC, IH6 PROPERTY
36 WASHINGTON, LP, DBA INVITATION
37 HOMES.
38

39 Defendants.

40 TO: NEWREZ, LLC (“NEWREZ”), Defendant;
41

42 TO: YOUR ATTORNEYS OF RECORD:
43

44 Pursuant to Fed.R.Bankr.P. 7026, 7033, and 7034 which incorporates Rules 26, 33 and
45 34 of the Federal Rules of Civil Procedure, Plaintiff, Sarah Hoover (the “Plaintiff”) propounds
46 these interrogatories and requests for production, to which Defendant NewRez, LLC
47

48 SECOND SET OF DISCOVERY TO NEWREZ
49 Adv No. 20-04002-MJH - 1

50 HENRY & DEGRAAFF, PS

51 787 Maynard Ave S

52 Seattle, WA 98104

53 Tel# 206-330-0595 / Fax# 206-400-7609

1 ("NewRez") shall respond separately and fully, in writing and under oath, and will produce
2 documents for inspection and copying for the documents described therein to the offices of
3 Henry & DeGraaff, PS, 787 Maynard Ave S, Seattle, WA 98104, within 30 days of the service
4 of these requests on Defendants and in accordance with the Instructions and Definitions set
5 forth below.

DEFINITIONS

Notwithstanding any definition below, each word, term, or phrase used in these Interrogatories is intended to have the broadest meaning permitted under the Federal Rules of Civil Procedure.

1. As used herein, the terms “You” and “Your” shall mean NewRez, LLC (“NewRez”), and all attorneys, agents, and other natural persons or business or legal entities acting or purporting to act for or on behalf of NewRez, whether authorized to do so or not. By use of the pronoun “you” it is intended that the answers are to include all information known to or reasonably ascertainable by NewRez, your agents, attorneys, investigators, employees and other representatives.
2. Any and all data or information which is in electronic or magnetic form should be produced in a reasonable manner.
3. “And” “as well as,” and “or” should be construed either disjunctively or conjunctively, as necessary to bring within the scope of these requests any matter which might otherwise be construed to be outside their scope.
4. The masculine gender of any word used herein includes the feminine and the neuter. The past tense of a verb used herein includes the present tense, and the present tense of any verb includes the past tense.
5. “Relate to,” “related to” or “relating to,” as used herein, means directly or indirectly referring to, alluding to, having any relationship to, pertaining to, concerning, connected with, commenting on, regarding, discussing, mentioning, reflecting, analyzing, constituting or embodying in whole or in part.
6. A document “relating” or “referring” to any given subject matter, as used herein, means any document that constitutes, contains, embodies, identifies, bears upon or deals with that subject, including, without limitation, emails, notes, electronic records, or documents concerning the preparation of documents.

SECOND SET OF DISCOVERY TO NEWREZ
Adv No. 20-04002-MJH - 2

HENRY & DEGRAAFF, PS
787 Maynard Ave S
Seattle, WA 98104
206.229.0505 / F 206.409.

1 7. "Document" is defined to include any and all manner of electronic, written, typed, printed,
2 emailed, reproduced, filmed or recorded material, and all photographs, pictures, plans or
3 other representations of any kind of anything pertaining, describing, referring or relating,
4 directly or indirectly, in whole or in part, to the subject matter at hand, and the term includes,
5 without limitation:

6 a. Papers, emails, texts, voice mail messages, books, journals, ledgers, statements,
7 memoranda, reports, invoices, work sheets, work papers, notes, transcriptions of
8 notes, letters, correspondence, abstracts, checks, diagrams, plans, blueprints,
9 specifications, pictures, drawings, films, photographs, graphic representations,
10 diaries, calendars, desk calendars, pocket calculators, calculators of any type, lists,
11 logs, purchase orders, messages, resumes, summaries, agreements, contracts,
12 telegrams, telexes, cables, recordings, audio tapes, magnetic tapes, visual tapes,
13 transcriptions of tapes or records, or any other writings or other tangible things on
14 which any handwriting, typing, printing, photostatic, or other forms of
15 communications are recorded or reproduced, as well as all notations on the
16 foregoing;

17 b. Originals and all other copies not absolutely identical;

18 c. All drafts and notes, whether typed, handwritten or otherwise, made or prepared in
19 connection with such document, whether used or not; and

20 d. Any medical record, chart, X-ray, book, log, pamphlet, periodical, letter, report,
21 memorandum, notation, message, record, study, working paper, chart, graph, index,
22 tape, minutes, contract, lease, invoice, record of purchase or sale, correspondence,
23 telegram, cable, electronic or other transcription or taping of telephone or personal
24 conversations or conference, and any and all other written, printed, typed, punched,
25 taped, filmed or graphic matter, however produced or reproduced.

26 8. "The Account" refers to the account sought to be collected from Ali Suleiman in this case
1 by PHH Mortgage Corporation d/b/a PHH Mortgage Services ("PHH"), HSBC Bank
2 USA, N.A., as Trustee of the Fieldstone Mortgage Investment Trust, Series 2006-2
3 ("HSBC"), NewRez, LLC ("NewRez").

4 9. A request to "name" or "identify" a certain person or persons is deemed to require the
5 person's full name, last known residence and phone number, job title, employer and
6 employer's business address and phone number. If the job title, etc. are set out in another
7 answer, their repetition is unnecessary.

8 10. When asked to "state the facts" your response should include (i) the identity of any
9 persons with any personal knowledge of the facts stated; (ii) the identity of any
10 documents concerning the facts stated; and (iii) the identity of any communications
11 concerning the facts stated.

12 11. "Complaint" means the initial complaint and any amended complaints filed in this action.

1 12. Any word or term not specifically defined: If you contend that a word or term that is not
2 specifically defined in these requests is vague or capable of multiple meanings that prevent
3 you from answering the interrogatory, then you should consult the Merriam Webster
4 dictionary available online at <http://www.merriam-webster.com> for a definition that is
5 incorporated into these requests by reference.

6 13. "Borrower(s)" means the individual from whom Defendant QLS foreclosed against, Ali
7 Suleiman and/or his estate in this case.

8 14. "Property" means the property at issue in this case located at 18205 106th Street East
9 Bonney Lake, WA 98391.

10 15. "Policy" or "Policies" means any practice, procedure, directives, routine, rule, courses of
11 conduct or code of conduct, written or unwritten, formal or informal, recorded or
12 unrecorded, which was recognized, adopted, issued or followed by you.

13 16. "QLS" means Defendant Quality Loan Services Corporation of Washington and includes,
14 without limitations, any offices, branches and locations of Defendant QLS, as well as any
15 of its attorneys, employees, managers, agents, consultants, vendors, contractors, advisors,
16 representatives, or PERSONS working on its behalf, and its parent organizations,
17 affiliates, predecessors, and assignors.

18 17. "PHH" means Defendant PHH Mortgage Corporation dba PHH Mortgage Services, and
19 includes, without limitations, any offices, branches and locations of Defendant PHH
20 Mortgage Corporation dba PHH Mortgage Services, as well as any of its attorneys,
21 employees, managers, agents, consultants, vendors, contractors, advisors, representatives,
22 or PERSONS working on its behalf, and its parent organizations, affiliates, predecessors,
23 and assignors.

24 18. "HSBC" means Defendant HSBC Bank USA, N.A. as Trustee of The Fieldstone
25 Mortgage Investment Trust, SERIES 2006-2, and includes, without limitations, any
26 offices, branches and locations of Defendant HSBC Bank USA, N.A. as Trustee of The
 Fieldstone Mortgage Investment Trust, SERIES 2006-2, as well as any of its attorneys,
 employees, managers, agents, consultants, vendors, contractors, advisors, representatives,
 or PERSONS working on its behalf, and its parent organizations, affiliates, predecessors,
 and assignors.

22 19. "IH6" means Defendant IH6 Property of Washington, LP d/b/a Invitation Homes, and
23 includes, without limitations, any offices, branches and locations of Defendant IH6
24 Property of Washington, LP dba Invitation Homes, as well as any of its attorneys,
25 employees, managers, agents, consultants, vendors, contractors, advisors, representatives,
26 or PERSONS working on its behalf, and its parent organizations, affiliates, predecessors,
 and assignors.

22 20. "Plaintiff" means Plaintiff Sarah Hoover.

SECOND SET OF DISCOVERY TO NEWREZ
Adv No. 20-04002-MJH - 4

HENRY & DEGRAAFF, PS
787 Maynard Ave S

Seattle, WA 98104

Tel# 206-330-0595 / Fax# 206-400-7609

21. "File" means all "Documents" or documented "Communications" related to the "Account" at issue in this case.

INTERROGATORIES

INTERROGATORY NO. 25:

IDENTIFY all documents which depict or relate to your financial statements (including but not limited to) balance sheet, income statement, cash flow statement.

RESPONSE:

INTERROGATORY NO. 26

IDENTIFY all employees of NewRez with knowledge of the Plaintiff's bankruptcy filing prior to January 1, 2020, and for each employee so IDENTIFIED, state his or her job title and the state and location where they work.

RESPONSE:

INTERROGATORY NO. 27:

DESCRIBE in detail all training for BANKRUPTCY POLICIES provided to the persons identified in response to Interrogatory No. 26, stating the dates on which each such person attended, and identifying the materials provided to each such person.

RESPONSE:

INTERROGATORY NO. 28:

IDENTIFY employment and salary records of the persons identified in response to Interrogatory No. 26.

RESPONSE:

SECOND SET OF DISCOVERY TO NEWREZ
Adv No. 20-04002-MJH - 5

HENRY & DEGRAAFF, PS
787 Maynard Ave S
Seattle, WA 98104

Tel# 206-330-0595 / Fax# 206-400-7609

1 **INTERROGATORY NO. 29:**

2 IDENTIFY the full and complete copies of all servicing manuals, memoranda, notes,
3 polices, and employee training materials related to reviewing, analyzing, and responding to
4 Notices of Bankruptcy filings and/or responding to any other correspondence from any party
5 notifying you of a bankruptcy filing by any method.

6 **RESPONSE:**

7

8 **INTERROGATORY NO. 30:**

9 IDENTIFY all consumer complaints from the Consumer Financial Protection Bureau
10 related to “Loan modification, Collection, Foreclosure” during the time period from January of
11 2019 to the present. *See* the Consumer Financial Protection Bureau’s Consumer Complaint
12 Database.

13 **RESPONSE:**

14

15

16 **INTERROGATORY NO. 31:**

17 IDENTIFY your responses to the consumer complaints as referred to in Interrogatory
18 No. 30.

19 **RESPONSE:**

20

21 **INTERROGATORY NO. 32:**

22 IDENTIFY all Risk Convergence Reports created by you or your agents for loans
23 involved in a Chapter 7 bankruptcy from January 1, 2018 and the present. *See* Original
24 Complaint, *Consumer Financial Protection Bureau v. Ocwen Financial Corporation, et al.*, No.
25 9:17-cv-80495 (S.D.Fla. April 20, 20117),
26

https://files.consumerfinance.gov/f/documents/20170420_cfpb_Ocwen-Complaint.pdf.

SECOND SET OF DISCOVERY TO NEWREZ
Adv No. 20-04002-MJH - 6

HENRY & DEGRAAFF, PS
787 Maynard Ave S
Seattle, WA 98104

Tel# 206-330-0595 / Fax# 206-400-7609

1 **RESPONSE:**

2

3

4

5 **INTERROGATORY NO. 33:**

6 IDENTIFY all consent judgments and/or settlement agreements and consent orders
7 against you or your agents entered into with the Washington State Attorney General by you
8 from January of 2017 to the present.

9

10 **RESPONSE:**

11 **INTERROGATORY NO. 34:**

12 IDENTIFY the number of instances where you or your agents were provided with notice
13 of a bankruptcy filing prior to a nonjudicial foreclosure sale and the nonjudicial foreclosure sale
14 nonetheless went forward.

15 **RESPONSE:**

16

17 **INTERROGATORY NO. 35:**

18 For those instances IDENTIFIED in Interrogatory No. 32, please explain what actions
19 you or your agents took after the sale.

20 **RESPONSE:**

21

22

23 **INTERROGATORY NO. 36:**

24 IDENTIFY all documents produced by you or your agents in the Civil Investigate
25 Demands made by the Plaintiff States in connection with the Consent Judgment entered into
26 with Ocwen/PHH on February 26, 2014. *See* Consent Judgment,

https://oag.ca.gov/sites/all/files/agweb/pdfs/mortgage_settlement/ocwen-consent-judgment.pdf.

SECOND SET OF DISCOVERY TO NEWREZ
Adv No. 20-04002-MJH - 7

HENRY & DEGRAAFF, PS
787 Maynard Ave S
Seattle, WA 98104

Tel# 206-330-0595 / Fax# 206-400-7609

1

2

3 **RESPONSE:**

4

5

INTERROGATORY NO. 37:

6

7

8

State your knowledge of any Compliance Review Quarterly Reports produced by you or
your agents to the Plaintiff States in connection with the Consent Judgment entered into with
Ocwen/PHH on February 26, 2014. *See* Consent Judgment,

9

https://oag.ca.gov/sites/all/files/agweb/pdfs/mortgage_settlement/ocwen-consent-judgment.pdf

10

RESPONSE:

11

12

13

INTERROGATORY NO. 38:

14

15

16

State your knowledge of any Monitor Reports received by you or your agents to the
Plaintiff States in connection with the Consent Judgment entered into with Ocwen/PHH on
February 26, 2014. *See* Consent Judgment,

17

https://oag.ca.gov/sites/all/files/agweb/pdfs/mortgage_settlement/ocwen-consent-judgment.pdf

18

RESPONSE:

19

20

INTERROGATORY NO. 39:

21

22

23

State your knowledge of any enforcement actions taken by the Plaintiff States against
you or your agents in connection with the Consent Judgment entered into with Ocwen/PHH on
February 26, 2014. *See* Consent Judgment,

24

https://oag.ca.gov/sites/all/files/agweb/pdfs/mortgage_settlement/ocwen-consent-judgment.pdf

25

RESPONSE:

26

SECOND SET OF DISCOVERY TO NEWREZ
Adv No. 20-04002-MJH - 8

HENRY & DEGRAAFF, PS
787 Maynard Ave S
Seattle, WA 98104

Tel# 206-330-0595 / Fax# 206-400-7609

1

2 **REQUESTS FOR PRODUCTION**

3

4

5 **REQUEST FOR PRODUCTION NO. 25:**

6

7

8 Produce all materials (including but not limited to webinars, physical books, electronic
9 materials or other documents) pertaining to the training and supervision of your employees or
10 agents as to compliance with foreclosure processes.

11

12 **RESPONSE:**

13

14

15 **REQUEST FOR PRODUCTION NO. 26:**

16

17

18 Produce all materials (including but not limited to webinars, physical books, electronic
19 materials or other documents) pertaining to the training and supervision of your employees or
20 agents as to compliance with the bankruptcy automatic stay, 11 U.S.C. § 362.

21

22

23 **REQUEST FOR PRODUCTION NO. 27:**

24

25

26 Produce all materials (including but not limited to webinars, physical books, electronic
27 materials or other documents) pertaining to the training and supervision of NewRez's employees
28 or agents as to compliance with NewRez's guidelines and/or policies and procedures regarding
29 nonjudicial foreclosures as to compliance with Washington State laws.

30

31 **RESPONSE:**

32

33

34

35 SECOND SET OF DISCOVERY TO NEWREZ
36 Adv No. 20-04002-MJH - 9

37 HENRY & DEGRAAFF, PS
38 787 Maynard Ave S
39 Seattle, WA 98104

40 Tel# 206-330-0595 / Fax# 206-400-7609

1

2 **REQUEST FOR PRODUCTION NO. 28:**

3 Produce all materials (including but not limited to webinars, physical books, electronic
4 materials or other documents) pertaining to the training and supervision of QLS and other
5 foreclosing Trustees by you or your agents for nonjudicial foreclosures in Washington State.

6 **RESPONSE:**

7

8

9 **REQUEST FOR PRODUCTION NO. 29:**

10 Produce all DOCUMENTS showing NewRez's net pretax profits for the five years
11 preceding and including the year the Plaintiff's Complaint was filed.

12 **RESPONSE:**

13

14

15 **REQUEST FOR PRODUCTION NO. 30:**

16 Produce all DOCUMENTS showing NewRez's net worth for the five years preceding
17 and including the year Plaintiff's Complaint was filed.

18 **RESPONSE:**

19

20

21 **REQUEST FOR PRODUCTION NO. 31:**

22 Produce all of NewRez's Annual Reports for the five years preceding the year Plaintiff's
23 Complaint was filed.

24 **RESPONSE:**

25

26

SECOND SET OF DISCOVERY TO NEWREZ
Adv No. 20-04002-MJH - 10

HENRY & DEGRAAFF, PS
787 Maynard Ave S
Seattle, WA 98104

Tel# 206-330-0595 / Fax# 206-400-7609

1

2 **REQUEST FOR PRODUCTION NO. 32:**

3 Produce all NewRez's balance sheets, profit and loss statements, income statements,
4 federal tax returns with all schedules, and any other document reflecting Defendant's overall
5 financial condition for the five years preceding the year Plaintiff's Complaint was filed.

6 **RESPONSE:**

7

8

9 **REQUEST FOR PRODUCTION NO. 33:**

10 Produce all DOCUMENTS evidencing other instances where NewRez was provided
11 notice of a bankruptcy filing prior to a foreclosure sale and you or your agents nonetheless went
12 forward with the foreclosure sale.

13 **RESPONSE:**

14

15

16 **REQUEST FOR PRODUCTION NO. 34:**

17 Produce all DOCUMENTS related to NewRez and the Civil Investigate Demands made
18 by the Plaintiff States in connection with the Consent Judgment entered into with Ocwen/PHH
19 on February 26, 2014. *See* Consent Judgment,

20 https://oag.ca.gov/sites/all/files/agweb/pdfs/mortgage_settlement/ocwen-consent-judgment.pdf.

21 **RESPONSE:**

22

23

24 **REQUEST FOR PRODUCTION NO. 35:**

25 Produce all documents related to NewRez and any Compliance Review Quarterly
26 Reports produced to the Plaintiff States in connection with the Consent Judgment entered into

SECOND SET OF DISCOVERY TO NEWREZ
Adv No. 20-04002-MJH - 11

HENRY & DEGRAAFF, PS
787 Maynard Ave S
Seattle, WA 98104

Tel# 206-330-0595 / Fax# 206-400-7609

1 with Ocwen/PHH on February 26, 2014. *See* Consent Judgment,

2 https://oag.ca.gov/sites/all/files/agweb/pdfs/mortgage_settlement/ocwen-consent-judgment.pdf

3 **RESPONSE:**

4

5

6

7 **REQUEST FOR PRODUCTION NO. 36:**

8 Produce all documents related to NewRez and any Monitor Reports sent to the Plaintiff
9 States in connection with the Consent Judgment entered into with Ocwen/PHH on February 26,
10 2014. *See* Consent Judgment,

11 https://oag.ca.gov/sites/all/files/agweb/pdfs/mortgage_settlement/ocwen-consent-judgment.pdf

12 **RESPONSE:**

13

14 **REQUEST FOR PRODUCTION NO. 37:**

15 Produce documents related to NewRez and any enforcement actions taken by the
16 Plaintiff States against you or your agents in connection with the Consent Judgment entered into
17 with Ocwen/PHH on February 26, 2014. *See* Consent Judgment,

18 https://oag.ca.gov/sites/all/files/agweb/pdfs/mortgage_settlement/ocwen-consent-judgment.pdf

19 **RESPONSE:**

20

21 Dated: February 23, 2021

22 HENRY & DEGRAAFF, PS

23 By: /s/ Christina L Henry

24 Christina L Henry, WSBA# 31273
25 Attorneys for Plaintiff
26 787 Maynard Ave S
Seattle, WA 98104
chenry@hdm-legal.com

SECOND SET OF DISCOVERY TO NEWREZ
Adv No. 20-04002-MJH - 12

HENRY & DEGRAAFF, PS

787 Maynard Ave S

Seattle, WA 98104

Tel# 206-330-0595 / Fax# 206-400-7609

Attorneys for Plaintiff Sarah Hoover

ANDERSON SANTIAGO, PLLC

By: /s/ Jason D. Anderson

Jason D. Anderson, WSBA# 38014

Attorneys for Plaintiff

787 Maynard Ave S

Seattle, WA 98104

jason@alkc.net

Attorneys for Plaintiff

SECOND SET OF DISCOVERY TO NEWREZ
Adv No. 20-04002-MJH - 13

HENRY & DEGRAAFF, PS

787 Maynard Ave S

Seattle, WA 98104

Tel# 206-330-0595 / Fax# 206-400-7609

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

VERIFICATION

STATE OF _____)

) ss.

COUNTY OF _____)

I, _____, being first duly sworn on oath, deposes and says:

I have read the within and foregoing answers and responses to Plaintiff's Second Set of Interrogatories Propounded to NewRez, LLC ("NewRez") and know the contents thereof, and believe the same to be true.

signature

SUBSCRIBED AND SWORN to before me this _____ day of _____, 2020

[PRINT NAME] _____

NOTARY PUBLIC for the State of _____
Residing at _____
My Commission Expires: _____

CERTIFICATE OF SERVICE

I, Christina L Henry, hereby certify that on February 23, 2021, I electronically transmitted the foregoing via email to the following:

McCARTHY & HOLTHUS, LLP
Attn: Joseph Ward McIntosh
108 1st Ave S Ste 300
Seattle, WA 98104-2104
jmcintosh@mccarthyholthus.com
Attorney for Quality Loan Service Corp. of Washington

HOUSER, LLP
Robert W. Norman, Jr.
600 University St, Ste 1708
Seattle, WA 98101
bnorman@houser-law.com
Attorneys for Defendants PHH Mortgage Corporation, HSBC Bank USA, N.A., as
Trustee of the Fieldstone Mortgage Investment Trust, Series 2006-2 and NewRez, LLC

SCHWEET LINDE & COULSON, PLLC
John Anthony McIntosh
575 S. Michigan St
Seattle, WA 98108-3316
johnm@schweetlaw.com
Attorneys for Defendant IH6 Property Washington, L.P. dba Invitation Homes

EXECUTED this 23rd day of February 2021 at Bothell, WA

/s/ Christina L Henry
Christina L Henry, WSBA #31273

SECOND SET OF DISCOVERY TO NEWREZ
Adv No. 20-04002-MJH - 15

HENRY & DEGRAAFF, PS
787 Maynard Ave S
Seattle, WA 98104

Tel# 206-330-0595 / Fax# 206-400-7609